

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,

v.

THOMAS M. FINNERAN,

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CRIMINAL ACTION  
NO. 05-10140-RGS

**MOTION OF GLOBE NEWSPAPER COMPANY TO INTERVENE AND TO  
VACATE OR MODIFY JULY 13, 2005 PROTECTIVE ORDER**

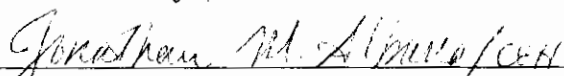
Globe Newspaper Company, Inc. (the "Globe") respectfully moves to intervene in this proceeding for the limited purpose of requesting that the Court vacate or modify the Protective Order entered in this case on July 13, 2005.

As grounds for its motion, the Globe relies on its memorandum of law, filed herewith. See also In re Boston Herald, Inc., 321 F.3d 174, 177 (1<sup>st</sup> Cir. 2003) (noting intervention of media in criminal case for purpose of pursuing access request); In re Globe Newspaper Co., 729 F.2d 47, 50 n.2 (1<sup>st</sup> Cir. 1984) ("Some courts have held that media representatives may challenge closure orders by appeal if they first intervene in the underlying action.").

WHEREFORE, Globe Newspaper Company, Inc. respectfully requests that its motion to intervene be allowed and that the Court grant its motion to vacate or modify the July 13, 2005 Protective Order.

**GLOBE NEWSPAPER COMPANY,  
INC.,**

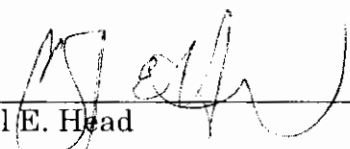
By its attorneys,

  
Jonathan M. Albano, BBO #013850  
Carol E. Head, BBO #652170  
**BINGHAM MCCUTCHEN LLP**  
150 Federal Street  
Boston, MA 02110-1726  
(617) 951-8000

Dated: July 26, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s) of record for each other party by facsimile and by mail on July 26, 2005.

  
Carol E. Head